

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X Case No.: 21-cv-10774 (LJL)(GWG)
MICHAEL D. COHEN,

Plaintiff,
-against-

UNITED STATES OF AMERICA,
DONALD J. TRUMP, former President of
the United States, WILLIAM BARR, former
Attorney General of the United States, MICHAEL
CARVAJAL, Director of the Bureau of Prisons,
JON GUSTIN, Administrator of the Residential
Reentry Management Branch of the Bureau of Prisons,
PATRICK McFARLAND, Residential Reentry
Manager of the Federal Bureau of Prisons,
JAMES PETRUCCI, Warden of FCI Otisville,
ENID FEBUS, Supervisory Probation Officer
of the United States Probation and Pretrial Services
ADAM PAKULA, Probation Officer of the
United States Probation and Pretrial Services,
and JOHN and JANE DOE (1-10) agents, servants,
and employees of the United States,

Defendants.

X

DECLARATION OF ANDREW C. LAUFER

Andrew C. Laufer, pursuant to the provisions of 28 U.S.C. sec. 1746, declares under
penalties of perjury, as follows:

1. I am the principal of the Law Office of Andrew C. Laufer, PLLC, attorney for the Plaintiff MICHAEL D. COHEN. I am familiar with the proceedings herein. I submit the declaration in support of plaintiff's cross-motion to compel discovery and in opposition to defendants motion for a stay of discovery.

2. Attached hereto as Exhibit A is Defendant Trump's Rule 26(a) response of April 18, 2022.

3. Attached hereto as Exhibit B is the decision of the Honorable Alvin K. Hellerstein, U.S.D.J. of July 23, 2020.

Dated: New York, New York
May 17, 2022

**LAW OFFICE OF
ANDREW C. LAUFER, PLLC**

By: Andrew C. Laufer
Attorney for Plaintiffs
Office & P.O. Address
264 West 40th Street, Suite 604
New York, New York 10018
(212) 422-1020

**LAW OFFICES OF
JEFFREY K. LEVINE**

By: Jeffrey K. Levine, Esq.
Attorney for Plaintiff
MICHAEL D. COHEN
340 West 57th Street, Suite 11E
New York, NY 10019
JL@NYadvocate.com
(212) 721-9600